

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Mack Adam Davis,

Case: 4:24-mj-30234

Assigned To : Ivy Jr., Curtis

Assign. Date : 6/20/2024

Case No. Description: RE: SEALED MATTER  
(EOB)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 17, 2024 in the county of Genesee in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
26 U.S.C. § 5861(d)	possession of a short-barreled rifle

This criminal complaint is based on these facts:

There is probable cause that on or about June 17, 2024, in the Eastern District of Michigan, Davis manufactured, possessed, and used a short-barreled rifle in violation of 26 U.S.C. § 5861(d) and 26 U.S.C. § 5861(f).

☒ Continued on the attached sheet.
  
 Complainant's signature

Jayson Chambers, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence and/or by  
reliable electronic means.Date: June 19, 2024City and state: Detroit, MI
  
 Judge's signature

Hon. David R. Grand, United States Magistrate Judge

Printed name and title

**AFFIDAVIT**

I, Jayson Chambers, being duly sworn, state the following is true and accurate to the best of my knowledge, information and belief.

1. I make this affidavit from personal knowledge based upon my participation in this investigation, with exception of the matters expressly stated, which are based upon information received from other law enforcement personnel and/or their reports and records. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or facts of which I have knowledge.

2. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been since November 2010. I am currently assigned to the FBI’s Detroit Division – Flint Resident Agency after serving five years with the FBI Boston Division’s Joint Terrorism Task Force and another five years with the FBI Detroit Division’s Joint Terrorism Task Force. I have served as a Special Agent for the FBI in the Flint Resident Agency for over four years.

**Summary**

3. I am currently investigating Mack Adam Davis for federal offenses involving illegal firearm possession and other federal offenses. As discussed below, there is probable cause that on or about June 17, 2024, in the Eastern

District of Michigan, Davis manufactured, possessed and used a short-barreled rifle in violation of 26 U.S.C. § 5861(d) and 26 U.S.C. § 5861(f).

4. As discussed below, on June 17, 2024, vehicles parked near Davis's residence in Owosso, Michigan were struck and damaged by gunfire. When officers from the Owosso Police Department responded to the scene, they determined that the gunfire likely originated from Davis's bedroom window. After executing a search warrant on Davis's residence, they determined that Davis was in possession of a short-barreled rifle in violation of 26 U.S.C. § 5861(d).

**Probable Cause**

5. On the morning of June 17, 2024, the Owosso Police Department responded to reports of gunfire near the intersection of two streets in Owosso. In their initial investigation, they determined that vehicles parked at two addresses on one of those streets had been struck by gunfire. The vehicles were approximately 100 feet from Davis's residence.

6. The individuals at one of the addresses whose cars had been struck by the gunfire were the victim of another crime on June 15, 2024. In that incident, their cars were spraypainted with anti-gay and homophobic messages.

7. Officers and detectives spoke with the local residents, including Davis. Officers and detectives determined that the trajectory of the gunfire originated

from the upstairs windows of Davis's residence. Davis confirmed that the windows in question were from his bedroom. He also confirmed that he was the only person in the house the night of June 16 and 17.

8. Owosso Police Department obtained a search warrant for Davis's residence. During the execution of that warrant, they collected a .22 caliber rifle with serial number #7CA213982P from the closet of Davis's sister's bedroom. The barrel had been altered so that the barrel length was 7.5 inches, and the total length of the rifle was 18.5 inches. According to 26 U.S.C. § 5845(a) a short-barreled rifle is defined as having one or more barrels less than sixteen inches in length and any weapon made from a rifle (whether by alteration, modification, or otherwise) if such weapon, as modified, has an overall length of less than twenty-six inches. To legally possess such a firearm, an individual must have it properly registered in the National Firearms Registration and Transfer Record.



9. Owosso Police collected 58 spent .22 caliber casings near the windows of Davis's bedroom. They also collected the two window screens, which contained holes consistent with small caliber bullets.

10. Davis also had items in his house indicating a support for nazi ideology, including: a notebook with a page where Davis drew a swastika and wrote "Kill um!! F [REDACTED];"<sup>1</sup> an Israeli flag with the words "anti-Jew f [REDACTED] killer" and "death to you all;" and a knife with the words "f [REDACTED] killer" written on the blade. Davis also wrote approvingly of mass shooters and wrote frequently of plans to conduct a mass shooting event targeting hospitals, synagogues, schools, mosques, and supermarkets.

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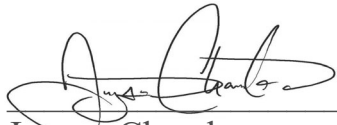
<sup>1</sup> Anti-gay slur, not redacted in original.

11. Davis admitted that he shortened the rifle's barrel length. He specifically stated that the rifle was "illegally modified." He admitted that he knew the rifle was shortened to a length that was not lawful, and that he shot the rifle at the cars. Davis also admitted to being the individual who defaced the cars with the anti-gay and homophobic messages, but denied any plans to commit a mass shooting or that he targeted the individuals' cars because of their sexual orientation.

12. I believe that Davis's statement that the rifle was "illegally modified" is an admission that Davis did not register it properly with the in the National Firearms Registration and Transfer Record.

*Conclusion*

13. Based on the facts set forth above, there is probable cause that on or about June 17, 2024, in the Eastern District of Michigan, Davis manufactured, possessed, and used a short-barreled rifle in violation of 26 U.S.C. § 5861(d) and 26 U.S.C. § 5861(f).



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Jayson Chambers  
Special Agent  
Federal Bureau of Investigation  
Flint, Michigan

Sworn to before me and signed in my presence and/or by reliable electronic means on this 19<sup>th</sup> day of June, 2024.



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Hon. David R. Grand  
United States Magistrate Judge  
Eastern District of Michigan

June 19, 2024